

## **REMARKS**

Favorable reconsideration of this application, as amended, is respectfully requested.

### **I. Specification**

The title of the invention was objected to, and has been amended accordingly. The specification was objected to due to a misspelling, and has been amended accordingly. A similar amendment was also made to the second full paragraph on Page 22 of the specification. Applicants respectfully submit that the objections to the Specification have been overcome.

### **II. Claims**

With respect to the rejections under 35 U.S.C. § 102(b), Claims 1–4, 7, 8 and 22–25 were rejected as being anticipated by Chaney (US 5,841,433) and Claims 9–11 and 26 were rejected as being anticipated by Eyer (US 6,160,545). With respect to the rejections under 35 U.S.C. § 102(e), Claims 14 and 15 were rejected as being anticipated by Schein et al. (US 2004/0111745 A1), Claim 19 was rejected as being anticipated by Amano et al. (US 5,911,046) and Claims 20 and 21 were rejected as being anticipated by Ellis et al. (US 2003/0200544 A1).

With respect to the rejections under 35 U.S.C. § 103(a), Claim 5 was rejected as being unpatentable over Chaney in view of Eyer, Claim 6 was rejected as being unpatentable over Chaney in view of Allison et al. (US 2005/0144638 A1), Claims 12 and 27–29 were rejected as being unpatentable over Eyer in view of Klosterman (US 6,072,983), Claims 13, 30, 31 and 33 were rejected as being unpatentable over Eyer in view of Coleman et al. (US 5,844,620), Claims 16–18 and 37 were rejected as being unpatentable over Hofmann (US 5,883,677) in view of Eyer and Claims 32 and 34–36 were rejected as being unpatentable over Eyer in view of Klosterman and in further view of Coleman.

Without acceding to the rejections under § 102 and § 103, Claims 19–21 have been canceled without prejudice and Claims 1, 7, 9–12, 14, 16 and 26–29 have been amended to recite, more clearly, certain features of the present invention.<sup>1</sup> No new matter has been added. Thus, Claims 1–18 and 22–37 are pending.

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<sup>1</sup> Claims 1, 14 and 16 have been amended, generally, for clarity. Claim 9 has been amended to clarify the technical meaning of the terms 'bouquet' and 'sub-bouquet' as 'channel set' and

Applicants respectfully submit that none of the cited references, taken either singly or in combination, teaches or suggests all of the features recited by the pending claims.

**Claim 1 is Patentable Over Chaney**

Chaney discloses a television system that receives digitally-encoded television programs and program schedule data over digital data transmission channels. A Master Program Guide (MPG) relates television program titles, start / end times and virtual channel numbers to information allocating virtual channels to transponder frequencies and time-multiplexed data stream positions. The MPG includes four sequential blocks of data, SEGM (Segment Map), APGD (Additional Program Guide Data), CSSM<sub>i</sub> (Channel-to-Service Segment Maps) and PISM<sub>i</sub> (Program Information Segment Maps). *See, e.g.,* Abstract; Col. 3:26–47; Col. 4:62–67; Col. 5:25–45. Applicants submit that Chaney fails to disclose many features recited by Claim 1, including, *inter alia*, means for receiving data defining a dictionary representing text portions, means for decompressing the program schedule data by identifying corresponding text portions in the dictionary, two versions of the dictionary and means for determining whether data corresponding to a text portion is in the stored version of the dictionary or the other version of the dictionary.

The Office Action opines that Chaney discloses data defining a dictionary (Col. 5:42–50).<sup>2</sup> Applicants disagree. Chaney's CSSM block describes virtual channels using various characteristics (e.g., channel name, number, etc.), while his PISM block contains linked lists of program information that are on each virtual channel described in the corresponding CSSM. Chaney fails to suggest that any of his program information may be decompressed by identifying corresponding text portions in a dictionary, or whether any of his data blocks are, themselves, "dictionaries" for use in such decompression. And, while FIG. 3 depicts a program guide screen display, Chaney fails to disclose that his program guide may be constructed by decompressing program schedule data using a dictionary, as recited by Claim 1.

Furthermore, Chaney fails to disclose receiving, storing and using two versions of the dictionary, as recited by Claim 1. While Chaney discloses a "change number" byte that is used

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<sup>2</sup>'channel subset,' respectively. These technical meanings are clearly supported by Fig. 5 and the corresponding description at Page 17, line 19 to Page 19, line 5, of the Specification. The terms 'bouquet' and 'sub-bouquet' may be specific to the DVB standards, and it is not intended that the invention of claims 9–13 and 26–32 be restricted to the DVB standard.

to identify the version number of the MPG (Col. 6:36–67), Chaney fails to teach or suggest that more than one version of the MPG may be stored and used at any time. Instead, Chaney's "change number" byte merely indicates whether the newly-received MPG should replace the currently-stored MPG or simply be discarded. In any event, Chaney's MPG is not a dictionary that is used to decompress program schedule data.

Moreover, Applicants submit that none of the remaining references cures Chaney's deficiencies. Consequently, Claim 1 is allowable over Chaney et al. Furthermore, Claims 2–8, and 22–25, depending from Claim 1, are also allowable, at least for the reasons discussed above.

### **Claim 9 is Patentable Over Eyer**

Eyer discloses an Integrated Receiver-Decoder (IRD) that receives an Interactive Program Guide (IPG) and channel map data. The IPG provides program scheduling information, while the channel map data allows the IRD to discard program sources that are not present in the channel map. The IRD is assigned to an IPG region and filters the IPG data based upon the assigned IPG region and the channel map data. *See, e.g.,* Abstract. Applicants submit that Eyer fails to disclose a receiver that includes means for storing a reference channel set identity and one or more reference channel subset identities, means for comparing the channel set identity and channel subset identity for a channel in a received signal with the reference channel set and channel subset identities and means for outputting the received television signal for display of the programme or other services defined thereby depending on the comparison, as recited by Claim 9.

The Office Action opines that Eyer's region IDs and national indicators respectively correspond to bouquet and sub-bouquet identities (Col. 8:5–10).<sup>3</sup> Applicants disagree. Eyer clearly teaches that IPG filter 355 filters IPG data based on its assigned region, so that IRD 300 only stores IPG data relevant to its assigned region. *See, e.g.,* Col. 8:43–57. Eyer simply fails to teach or suggest comparing the channel set and channel subset identities, for a channel in a received signal, with a reference channel set and channel subset identities, as recited by Claim 9.

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<sup>2</sup> Office Action at Paragraph 6 (Pages 3–4).

<sup>3</sup> Office Action at Paragraph 7 (Page 5).

Furthermore, Applicants submit that none of the remaining references cures Eyer's deficiencies. Consequently, Claim 9 is allowable over Eyer et al. Furthermore, Claims 10–13 and 26–37, depending from Claim 9, are also allowable, at least for the reasons discussed above.

#### **Claim 14 is Patentable Over Schein**

Schein discloses an interactive electronic program guide (IPG) that resides on a user's "TV system" (e.g., set top box, personal computer, television with custom board, etc.). *See*, e.g., FIG. 2; Paragraph 0039. Schein teaches that a theme search may be performed that matches channel entries in the IPG with a particular theme criteria, and then sorts the list of matched channels "in time order." *See*, e.g., FIG. 8; Paragraphs 0084 to 0095. Applicants submit that Schein fails to disclose a receiver that receives television signals that include sorting data defining a sorting list and scheduling data defining a schedule of program event, where the receiver filters the received scheduling data based on the received sorting list data, and displays the filtered schedule in an order that depends upon the sorting list data, as recited by Claim 14. Simply put, Schein teaches an *in-situ* sorting operation based upon user-selected theme criteria, rather than a filtering operation based upon sorting list data received in a television signal.

Furthermore, Applicants submit that none of the remaining references cures Schein's deficiencies. Consequently, Claim 14 is allowable over Schein et al. Furthermore, Claim 15, depending from Claim 14, is also allowable, at least for the reasons discussed above.

#### **Claim 16 is Patentable Over Hofmann in View of Eyer**

Hofmann discloses a method for receiving, organizing and presenting program information (e.g., electronic program guide) from different outside sources (e.g., CATV 310, TELCO 314, DBS 320) on a user's display device (e.g., television). *See*, e.g., FIGS. 1 and 3; Col. 3:37–45; Col. 4:47–60; Col. 9:30–48. Hofmann fails to teach or suggest many features recited by Claim 16, including, *inter alia*, a receiver that receives programme schedule data broadcast in a first network at a faster rate than in a second network, and that includes a cache store for storing a portion of programme schedule data for the first and/or the second network transmitted from time to time in at least one of the channels broadcast in the first network and/or the second network, means for decoding the data in the cache store for display of a programme schedule of the first or second broadcast network and means for receiving and

decoding additional programme schedule data from the first network for either the first or second broadcast network. The Office Action apparently agrees.<sup>4</sup>

The Office Action then cites Eyer in an attempt to cure the deficiencies of Hofmann. Applicants disagree. Eyer fails to teach or suggest a first network that broadcasts program schedule data at a faster rate than a second network broadcasts program schedule data, a cache for storing the different data, means for decoding the cache data and means for receiving additional program data. While Eyer discloses receiving programming from a CATV network and a satellite network, he fails to suggest that program schedule data is broadcast over both networks. Instead, Eyer clearly teaches that his IPG data is delivered to his IRDs via a single network, i.e., a satellite network. *See*, Abstract. The Office Action recognizes this teaching – “Eyer discloses that the interactive program guide (IPG) is being broadcast over the satellite network” (Office Action at Page 13, lines 15–16). Thus, Eyer fails to cure the deficiencies of Hofmann.

Furthermore, Applicants submit that none of the remaining references cures Eyer’s deficiencies. Consequently, Claim 16 is allowable over Hofmann and Eyer et al. Furthermore, Claims 17 and 18, depending from Claim 16, are also allowable, at least for the reasons discussed above.

### **III. Summary**

In view of the foregoing amendment and remarks presented herein, Applicants respectfully submit that this application is in condition for allowance and should now be passed to issue.

A Notice of Allowance is respectfully solicited.

If any extension of time is required in connection with the filing of this paper and has not been requested separately, such extension is hereby requested.

The Commissioner is hereby authorized to charge any fees and to credit any overpayments that may be required by this paper under 37 C.F.R. §§ 1.16 and 1.17 to Deposit Account No. 02-2135.

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<sup>4</sup> *See*, Office Action at Paragraph 16 (Pages 12–14) (“Hofmann is silent ...” at Page 13, lines 2–11).

Respectfully submitted,

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